



**General Aviation
Manufacturers Association**

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May 6, 2002

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street SW
Washington, DC 20590-0001

RE: Docket No. FAA-2001-11133; Notice No. 02-03

Ladies and Gentlemen:

For thirty-two years, the General Aviation Manufacturers Association (GAMA) has represented U.S. manufacturers of certificated general aviation airplanes, engines, avionics and other components. GAMA members also operate Fixed Base Operations (FBOs), maintenance and repair facilities, and pilot and maintenance training facilities across the U.S. and internationally. GAMA members have produced over 90 percent of the certificated general aviation airplanes currently operated worldwide.

GAMA offers the following comments, detailed below:

1. GAMA generally supports the proposed requirements to certificate, operate, maintain and manufacture Light Sport Aircraft (LSA).
2. Certification of LSA must not detract from FAA's current aircraft certification responsibilities.
3. LSA should be clearly placarded so that pilots and passengers understand the aircraft may not comply with FAA design and/or production regulations.
4. Accidents involving LSA should not be categorized with other general aviation accidents.
5. Communication and navigation equipment required by Part 91 for LSA should be maintained to the standards established by FAR Part 43.



6. Pilot-in-command time logged in a LSA should not be credited toward training or experience required for a pilot certificate in a different class of aircraft.

Below are detailed comments in these 6 areas.

1. GAMA Generally Supports The Proposed Requirements To Certify, Operate, Maintain And Manufacture Light Sport Aircraft (LSA). GAMA believes that when implemented, the NPRM could interest more people in becoming a pilot, and in enjoying the many practical benefits of traveling in general aviation aircraft of all sizes, both for business and pleasure. Accordingly, by increasing the effectiveness and availability of air transportation, while maintaining or increasing the current margin of safety, the U.S. economy and the public will benefit from these proposed rule changes.

Both the Sport Pilot and Light-Sport Aircraft portions of this rule should be expeditiously implemented. As aircraft meeting the requirements for a Light-Sport Aircraft are already available, this is especially feasible for the Sport Pilot portion of the NPRM.

2. Certification of Light Sport Aircraft Must Not Detract From FAA's Current Aircraft Certification Responsibilities. The fundamental concept outlined in the NPRM for certifying LSA is that manufacturers, using FAA-appointed designees, can develop adequate design and production standards, ensure these standards are self-enforced, and ensure the continuing airworthiness of their products. GAMA believes this concept has merit.

According to statements made by FAA certification representatives in a public forum on February 26th, FAA is not planning to add additional staff to oversee design or production of LSA, nor to oversee the continued airworthiness of LSA. However, FAA intends to provide oversight for a significant number of designees who will perform these functions.

GAMA members are already concerned that FAA's resources for current and projected certification programs may be inadequate. If FAA finds that certification of LSA requires unanticipated resources, priority must be given to aircraft that are designed, manufactured and certified according to FAA regulations.

3. LSA Should Be Clearly Placarded So That Pilots and Passengers Understand The Aircraft May Not Comply With FAA Design And/Or Production Regulations. Unlike manufacturers of LSA, manufacturers that design, produce, certify, and maintain the airworthiness of their products according to FAA regulations incur significant additional costs. While GAMA does not believe the certification process for LSA outlined in the NPRM will necessarily yield a lesser margin of safety, there is no doubt that the public gains a substantial degree of reassurance from direct FAA oversight of the entire aircraft design, production and certification standards and processes. Pilots and passengers should be readily able to differentiate between the products that offer this FAA reassurance, and those that do not.

4. Accidents Involving LSA Should Not Be Categorized With Other General Aviation Accidents. Today, accidents involving ultralights are not counted in FAA or National Transportation Safety Board (NTSB) totals of general aviation accidents. FAA categorizes ultralights as “vehicles” --- subject to their own set of regulations --- not aircraft.

FAA and NTSB should continue to investigate any aviation accident (vehicle or aircraft) deemed appropriate. But including accidents involving LSA in the total number of general aviation accidents could distort the actual margin of safety for either category, making it more difficult to develop appropriate accident interventions.

In addition, FAA has great difficulty in accurately determining the number of hours flown (the denominator for any accident rate) by general aviation aircraft, as general aviation is currently defined. As there is no requirement for operators of LSA to report the number of hours flown, it will be even more difficult for FAA to accurately determine or even estimate total general aviation flight activity. Including accidents involving LSA in general aviation accident totals, without adding their corresponding activity to the denominator, would also significantly distort measures of safety.

5. Communication And Navigation Equipment Required By Part 91 For LSA Should Be Maintained To The Standards Established By FAR Part 43. Avionics required on LSA for entry into any airspace must be installed and maintained to the same standards as other aircraft operating in that airspace.

6. Pilot-in-command time logged in a LSA should not be credited toward training or experience required for a Private Pilot Certificate. The proposed changes to Part 61 should clearly state that time logged as pilot-in-command of a LSA can only be credited toward time required for a Sport Pilot or Sport Pilot Instructor certificate.

Sincerely,

A handwritten signature in black ink, appearing to read 'ED Bolen', with a stylized flourish at the end.

Edward M. Bolen
President